



**U.S. Department of Justice**

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September 2, 2022

The Honorable Ellen L. Hollander  
United States District Judge  
U.S. Courthouse  
101 W. Lombard St.  
Baltimore, MD 21201

RE: United States v. Jamal Brownlee, et al.  
Crim No.: ELH-22-0125

Dear Judge Hollander:

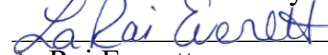
I am writing to provide a status report on the above-referenced matter. On April 6, 2022, five defendants were charged in an indictment stemming from a wiretap investigation. The bulk of the discovery has already been provided to counsel and the government will continue to do so as needed and/or required. The parties have not yet started plea discussions but anticipate those discussions soon. Additionally, counsel for Mr. Dorsey requested a pre-plea criminal history report in June 2022. Once, we receive that report the parties anticipate further plea discussions.

The government also anticipates seeking a superseding indictment in this case, which current counsel is aware of the possibility of additional and/or new charges. As such, no one is requesting a scheduling order at this time and the parties consent to continuing to exclude time under the Speedy Trial Act. The parties are requesting another status update in 60 days. By that time, the balance of the discovery will have been provided as well as any additional charges will have been filed.

I thank the Court for its consideration of this matter.

Sincerely,

Erek L. Barron  
United States Attorney

  
LaRai Everett

Brandon Moore  
Assistant United States Attorneys

cc: Counsel via ECF filing